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**From:** Palma, Elizabeth [Palma.Elizabeth@epa.gov]  
**Sent:** 2/9/2017 5:42:04 PM  
**To:** ingrid.hewitson@state.co.us  
**CC:** Payton, Richard [Payton.Richard@epa.gov]; CHANG, RANDALL [Chang.Randall@epa.gov]  
**Subject:** Exceptional Events Mitigation  
**Attachments:** SubH\_mitigation Crosswalk.docx; DRAFT Mitigation Plan Checklist\_2017\_0105 template.docx

Ingrid –

As we discussed yesterday, I am forwarding an example (draft) crosswalk that we recently received from HI. HI is subject to the subpart H emergency episode planning requirements under 40 CFR 51.152 as well as to the new exceptional events mitigation requirements under 40 CFR 51.930. Because many of the mitigation/contingency planning elements in these 2 programs are the same, HI is developing a single plan that meets the regulatory requirements of both programs. The plan introduction indicates that the area is subject to both plans and then points to the crosswalk in the appendix. You may be able to take the same approach with your 40 CFR 51.930 mitigation plans and NEAPs, either by augmenting an existing NEAP or by cutting and pasting NEAP components into a (new) mitigation plan. Also as we discussed, I have attached a checklist that we developed to guide our internal review of mitigation plans. This checklist provides more detail on the 51.930 regulatory requirements – feel free to use (or not).

Please let me (or Richard Payton) know if you have any additional questions. Also, if you decide to develop a 51.930/NEAP crosswalk or consolidated plan, we would be interested in seeing (and sharing) that potentially in advance of receiving a final plan.

Beth

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